

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In Re Forfeiture Order of Tim Leissner

23-MC-01505 (MKB)(JRC)

**DECLARATION OF JEFFREY ALBERTS IN SUPPORT OF
PETITIONER RUSSELL SIMMONS'S MOTION FOR EXPEDITED DISCOVERY**

I, Jeffrey Alberts, declare pursuant to 27 U.S.C. § 1746, that the following is true:

1. I am an attorney licensed to practice in the State of New York. I am a partner of Pryor Cashman LLP, attorneys for Petitioner Russell Simmons, individually and derivatively on behalf of Nu Horizons Investment Group LLC, in the above-captioned matter.

2. I submit this Declaration in Support of Mr. Simmons's Motion for Expedited Discovery.

3. Attached hereto as Exhibit A is a true and correct copy of the Verified First Amended Complaint filed on November 17, 2023 by Keyway Pride Limited LLC in *Keyway Pride Limited LLC v. 25 Beverly Park Circle PropCo LLC et al.*, No. 21SMCV00182 (Sup. Ct. Cal.) ("Beverly Compl.").

4. Attached hereto as Exhibit B is a true and correct copy of KLSL0000000041, a document produced to Mr. Simmons in discovery in this matter by Petitioner Kimora Lee Simmons-Leissner.

5. Keyway Pride is the plaintiff in an ongoing litigation in California state court concerning a mansion in Beverly Hills that it purportedly owns and in which Ms. Lee lives. *See Keyway Pride Limited LLC v. 25 Beverly Park Circle PropCo LLC et al.*, No. 21SMCV00182

(Sup. Ct. Cal.) (“Beverly Park Litigation”). As relevant here, Keyway Pride alleges that Defendant Leissner, without Keyway Pride’s knowledge or authorization, entered into an agreement on behalf of Keyway Pride to sell the mansion to 25 Beverly Park Circle Propco LLC (“Propco”) in November 2020. (*See* Beverly Compl. ¶ 22.)

6. [REDACTED]

7. [REDACTED]

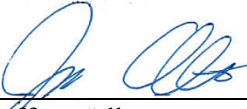
8. [REDACTED]

9. [REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

October 21, 2024



Jeffrey Alberts